

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

*Plaintiffs,*

vs.

GOOGLE LLC,

*Defendant.*

No: 1:23-cv-00108-LMB-JFA

**DEFENDANT GOOGLE LLC'S MOTION TO COMPEL  
RESPONSES TO VARIOUS DISCOVERY REQUESTS**

Pursuant to Federal Rules of Civil Procedure 36(a)(6) and 37 and Local Civil Rule 37(A), Defendant, Google LLC ("Google"), moves the Court to enter an order: (1) compelling Plaintiff United States to supplement its Rule 26(a)(1)(A)(iii) disclosures and its responses Google's Requests for Admissions 1–3, Interrogatories 4, 9, 14, 17–21, and Requests for Production 12 and 44; and (2) overruling Plaintiff's improper objections to Google's RFAs 4–12 and Interrogatories Nos. 22–29. The grounds and reasons for granting this motion are stated with particularity in the accompanying memorandum of law and attached exhibits. A proposed order is submitted herewith.

***CERTIFICATE: Undersigned counsel certifies that a good faith effort to narrow or eliminate the dispute was undertaken prior to the filing of this motion.***

Dated: September 8, 2023

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